



AKRON REGIONAL
AIR QUALITY MANAGEMENT DISTRICT

Agent of the Ohio Environmental Protection Agency • Division of the Akron Health Department
Serving Medina, Portage and Summit Counties

TELEPHONE: (330) 375-2480
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L. M. Malcolm, P.E.
Administrator

September 10, 2009

CERTIFIED MAIL

Mr. Duane Crawford
HPC Integrated Graphics Solutions, LLC
1034 Home Avenue
Akron, OH 44310

Dear Mr. Crawford:

RE: NOTICE OF VIOLATION

This is in follow-up to a compliance evaluation conducted by this agency on Tuesday, September 1, 2009 at your Akron, Ohio facility (1677010069) and is intended to summarize findings regarding the general compliance status of your facility with applicable air pollution control requirements. I would like to thank you for your cooperation during my visit to your facility.

I must advise you that HPC Integrated Graphics Solutions, LLC is operating emissions unit K001 (5 Unit Hantscho Web Press) in violation of its Permit to Operate (PTO) which was issued final on January 23, 2008 and Permit to Install (PTI) #16-719 which was issued final on February 1, 1989 and subsequently administratively modified on November 14, 1991.

The PTO requires the permittee to perform an annual preventative maintenance inspection of the catalytic incinerator and weekly inspections of the external integrity of the catalytic incinerator. During each annual inspection a sample of catalyst material is required to be collected from the catalyst bed and used to perform a catalyst activity test. The permittee is required to record the results of each annual inspection, each annual catalyst activity test, each weekly inspection, and the date(s) of catalyst replacement. It appears that the above mentioned inspections and annual catalyst testing have not been performed. Also, no records were available of the annual and weekly inspections or dates when catalyst was replaced or added to the incinerator. These deficiencies constitute a violation of Part II: Special Terms and Conditions C.3 and E.3 of the PTO.

The PTO requires the permittee to submit an annual report on the results of the catalyst activity tests and a summary of the results of the annual inspection of the internal integrity of the catalytic incinerator. These reports shall be submitted within 45 days after the annual catalyst activity test is performed. To date this report has not been submitted which constitutes a violation of Part II: Special Term and Condition D.4 of the PTO.

CITICENTER - SUITE 904

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The PTO and PTI #16-719 requires the maximum volatile organic compound (VOC) content of any of the cleanup materials employed in emissions unit K001 shall not exceed 6.7 pounds per gallon. The VOC content of cleanup material being employed in emissions unit K001 is 6.879 pounds per gallon. This constitutes a violation of Part II: Special Term and Condition B.2 of the PTO and Additional Special Term and Condition 1 of PTI #16-719.

The PTO requires the permittee to maintain monthly records of the company identification of the cleanup material employed, the number of gallons of each cleanup material employed, the total number of gallons of all cleanup material employed, and the volatile organic compound (VOC) content of each cleanup material, in pounds per gallon. The material data safety sheet of the cleanup material employed was the only record being kept. Not maintaining the above-mentioned records is a violation of Part II: Special Term and Condition C.2 of the PTO.

The PTO requires the permittee to submit deviation report on any monthly record showing the use of a noncomplying cleanup material within 30 days following the end of the calendar month in which the deviation occurred. The permit is also required in the PTO to submit an annual report by January 31 of each year which specifies the amount of cleanup materials employed in emissions unit K001 during the calendar year. To date the noncomplying cleanup material deviation reports and the annual cleanup material usage report have been submitted which constitutes a violation of Part II: Special Terms and Conditions D.6 and D.7 of the PTO.

The PTO requires the permittee to record the catalyst bed temperature on a daily basis. This record is not being maintained by the permittee which constitutes a violation of Part II: Special Term and Condition C.6 of the PTO.

The PTO requires the temperature monitors and recorder(s) to be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendation. Occasionally, the circular temperature chart has not been changed on time causing the data to overlap. It does not appear that the recorder is being maintained properly as required by Part II: Special Term and Condition C.4 of the PTO.

The PTO requires the permittee to submit quarterly deviation reports for all periods of time during which the temperature of the catalyst bed did not meet the temperature limitation specified in the permit and/or each period of time when the average temperature of the exhaust gases immediately before the catalyst bed was outside the acceptable value. To date no quarterly reports have been received which constitutes a violation of Part II: Special Term and Condition D.1 of the PTO.

It appears that the catalytic incinerator may not be operating properly. If the locations of the thermocouples are as shown in your fax dated September 8, 2009, then it appears that the exhaust gases immediately before the catalyst bed is below what the manufacturer of the control equipment suggests. The manufacturer shows this temperature should be 650 degree Fahrenheit on the process flow schematic for the catalytic incinerator. The temperature that has been consistently recorded on the chart recorder for the exhaust gases immediately before the catalyst bed is 225 degrees Fahrenheit. The PTO requires the average exhaust gas temperature immediately before the catalyst bed, for any three hour block of time when

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emissions unit K001 is in operation, shall not be less than 660 degrees Fahrenheit. The PTO also requires the catalyst bed temperature to not be less than 700 degrees Fahrenheit, when emissions unit K001 is in operation. During the inspection, the catalyst bed temperature was 660 degrees Fahrenheit. The above mentioned temperature deviations constitutes a violation of Part II: Special Term and Condition C.5 of the PTO.

A Roland 700 non-heatset sheet fed printing press has been installed and is operating at your facility. Installing and operating an air contaminant sources without first obtaining a permit to install (PTI) or a permit to install and operate (PTIO) constitutes a violation of OAC rule 3745-31-02(A).

I have enclosed the appropriate application forms along with permit exemption regulations. If you feel that this printing press is exempt from permitting, please notify this Agency in writing. Written notification should include a description of the equipment along with the appropriate Ohio Administrative Code (OAC) rule citation and, if necessary, calculations to demonstrate the equipment meets the exemption.

No later than fourteen (14 days) from the receipt of this letter, please submit a complete PTI/PTIO application for the Roland 700 printing press or documentation that this press is exempt, records showing how long the non-compliant cleanup material has been employed, and a complete compliance plan and time schedule to this agency to bring emissions unit K001 back into compliance with the terms and condition of the PTO and PTI 16-719. The plan and schedule must contain specific steps that either are or will be taken to bring this facility into compliance along with their corresponding deadlines or milestone dates. If you need additional time, please notify this agency in writing.

The submission of the requested information, PTI/PTIO application, and compliance plan and time schedule does not constitute a waiver of the authority of either the Ohio Environmental Protection Agency (Ohio EPA) or US EPA to seek penalties in this matter. The decision to pursue, or decline to pursue, additional enforcement action in this case will be made at a later date. Please be aware that economic benefit of noncompliance is taken into account when determining the penalty.

Sincerely,



Laura Miracle
Air Quality Engineer II

Enclosures

c: Ms. Lisa Holscher - US EPA
Mr. Tom Kalman - Ohio EPA